

COMMENT/RESPONSE DOCUMENT
SIP Revision for the Philadelphia Ozone Nonattainment Area
Revised Highway Vehicle Emission Budgets
Proposed May 26, 2001

COMMENTATORS

1. Joseph Otis Minott, Esq.
Clean Air Council
135 S. 19th Street, Suite 300
Philadelphia, PA 19103

Comment #1: The commenter had no adverse comments on Pennsylvania's proposed SIP revision with the understanding that the whole budget will be revisited within one year of MOBILE 6 becoming EPA's official testing methodology.

Response: The Department will be revising the mobile emissions inventory and mobile budgets with MOBILE 6 as required by the Clean Air Act. The Department recognizes that following official release by the EPA, MOBILE 6 will represent the most current approved model.

Comment #2: The commenter understands that through this submission Pennsylvania is committing to submit to EPA a mid-course review no later than December 2003.

Response: Recognizing that regular evaluation is an important part of any planning process, Pennsylvania will submit to EPA mid-course review as the Clean Air Act and the rules and regulations under the Clean Air Act require.

Comment #3: The commenter is a strong supporter of Pennsylvania adopting the California LEV II program.

Response: The purpose of this SIP revision is to revise transportation conformity budgets to take into account additional emission reductions expected from the federally adopted Tier2/low sulfur in fuel rule as discussed in EPA's proposed rule of Dec. 16, 1999. As stated in the order adopting Pennsylvania's National Low Emission Program (Dec. 5, 1998), the Commonwealth intends to reassess the air quality needs and emission reduction potential of both the federal and California programs for light-duty vehicles in advance of the end of the Commonwealth's commitment to NLEV (model year 2006).